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Please Reply to the New Jersey Address

March 15, 2022

Nicholas Bowers. Esq.  
Gary Tsirelman, PC  
129 Livingston Street, Suite 2  
Brooklyn, New York 11201

Re: Capital 7 Funding v. Wingfield, et al.  
17-CV-04275

Dear Mr. Bowers:

Please accept this letter as the Rabito/Laljie defendants objections to your most recent discovery demands. The Rabito/Laljie defendants will not be producing any documents related to Prestige Investment Associates or First Choice Payment Systems. As you are aware, those entities were dismissed from this case some time ago and are, therefore, non-parties to this action.

Pursuant to Rule 26 (a)(1)(A)(i), the Rabito/Laljie defendants hereby demand the names addresses, telephone numbers and email addresses of each and every employee, officer and/or shareholder of and/or anyone who invested or had a financial interest in Capital 7 Funding and/or 3 Leaf Capital.

Sincerely,

*s/ Daniel L. Bibb*

Daniel L. Bibb, Esq.  
Attorney for Joseph Rabito and Damian Laljie